

# HAFETZ NECHELES & ROCCO

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December 8, 2011

VIA ECF

The Hon. Sterling Johnson, Jr.  
Senior United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Lebovits, et al., No. 11 Crim. 134

Dear Judge Johnson:

Pursuant to the Court's order of today's date, the defendants who have filed pre-trial motions in the above-referenced action (the "Moving Defendants") submit this joint letter together with the government.

- Moses Neuman has filed a motion to suppress (Docket No. 66);
- Yudah Neuman has filed a motion for discovery and a motion to suppress (Docket Nos. 63 and 64);
- Avigdor Gutwein has filed a motion to dismiss and a motion to suppress (Docket No. 62); and
- Chaim Lebovits has filed a motion for a bill of particulars (Docket No. 65).

Each Moving Defendant agrees with the government that his respective pre-trial motions should be held in abeyance until the next scheduled conference before Your Honor on January 19, 2012, for the purpose of his own plea negotiations.

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Respectfully submitted,

s/Susan R. Necheles  
Susan R. Necheles  
*Counsel for Defendant Moses Neuman*

s/David Spears  
David Spears  
*Counsel for Defendant Yudah Neuman*

s/Jacob Laufer  
Jacob Laufer  
*Counsel for Defendant Avigdor Gutwein*

s/ Nathaniel Z. Marmur  
Nathaniel Z. Marmur  
*Counsel for Defendant Chaim Lebovits*

s/Charles Kleinberg  
AUSA Charles Kleinberg  
*Counsel for the United States*

cc: All Counsel (*via ECF*)